

REMARKS

At the outset, the Examiner is thanked for the thorough review and consideration of the pending application. The Office Action dated October 12, 2006 has been received and its contents carefully reviewed.

Claims 1-31 are pending with claims 1-11 having been withdrawn. Claim 12 has been amended to correct a typographical error, and claims 24-31 have been added.

In the Office Action, claims 12-23 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,665,043 to Okuyama et al. (hereafter "Okuyama") in view of U.S. Patent No. 5,407,519 to Joffe et al. (hereafter "Joffe"). The rejection of claims 12-23 is respectfully traversed and reconsideration is requested.

Claims 12-19 and 24 are allowable over the cited references in that each of the claims recites a combination of elements, including, for example, "providing a suction force applying means within each passage for transmitting a suction force a predetermined distance from the contact surface" and "transmitting the generated suction force from the suction force applying means to operably proximate portions of the substrate". Claims 20-23 and 25-27 are allowable over the cited references in that each of the claims recites a combination of elements, including, for example, "transmitting the generated suction force to an application point at a predetermined distance away from the contact surface of the upper stage". None of the cited references including Okuyama and Joffe, singly or combination, teaches or suggests at least these features of the claimed invention.

In particular, the Examiner cites Okuyama for disclosing a method of holding a substrate to an upper stage by providing holes in the upper stage to stick and secure the substrate by vacuum suction through a conductor in the upper stage (see figures 1 and 8 and column 8, lines 16-27). The Examiner cites Joffe for disclosing a method of holding a substrate to a lower stage by providing four suction cups drawn upwards through hollow posts in the lower stage, wherein the suction cups are capable of being raised above the upper surface of a vacuum chuck on the lower stage (see figure 14 and column 11 lines 47-55). The Examiner asserts that it would

have been obvious to modify the method of holding a substrate to an upper stage of Okuyama by combining it with the method of holding a substrate to a lower stage of Joffe.

Applicants respectfully submit that there is no motivation to combine the upper stage holding method of Okuyama with the lower stage holding method of Joffe and that Joffe teaches away from the claimed invention. Applicants note that Joffe discloses a detailed description of the lower stage (see col. 8 line 30 - col. 11 line 55) separate from a detailed description of the upper stage (see col. 11 line 56 - col. 15). One of ordinary skill would not look to the disclosure in Joffe relating to the lower stage when modifying the upper stage holding method of Okuyama. Additionally, the Examiner states as the motivation to combine that the suction force applying means would be capable of receiving a substrate directly from a transfer device and placing the substrate on the contact surface. However, Applicants respectfully note that the passage cited for the motivation statement (see Joffe; col. 11 lines 47-55) discloses that the raised position of the suction cups are designed to receive a lower substrate from a transfer device. One of ordinary skill in the art would not use this to modify the upper substrate holding method of Okuyama because the purpose of the raised position of the suction cups of Joffe are to receive a lower substrate and not an upper substrate. There is no motivation to modify an upper stage holding method. Also, the modification to Okuyama would not be as simple as merely adding the suction cups of Joffe. Joffe discloses that the suction cups are supported by bearing bores, a bearing holder, lower and upper bearings, loader posts, a loader based plate, a loader and an air cylinder. In view of the above, Applicants respectfully request withdrawal of the rejection of claims 12-23.

Moreover, Applicants respectfully submit that newly presented claims 28-31 are allowable over the cited references in that each of these claims recites a combination of elements including, for example, “arranging a substrate proximate to an upper stage, wherein portions of the substrate sag”; and “transmitting a suction applicator to a sagging portion of the substrate”.

In view of the foregoing, Applicant believes that this application is now in condition for allowance and therefore requests favorable consideration and prompt allowance of the pending claims.

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at (202) 496-7500 to discuss the steps necessary for placing the application in condition for allowance. All correspondence should continue to be sent to the below-listed address.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136, and any additional fees required under 37 C.F.R. §1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. A duplicate copy of this sheet is enclosed.

Dated: January 10, 2007

Respectfully submitted,


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